



DEPARTMENT OF HUMAN SERVICES
SENIOR & DISABLED SERVICES DIVISION
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AUTHORIZED BY: _____
SDSD Administrator/Deputy/
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INFORMATION MEMORANDUM
SDSD-IM-01-069
Date: August 20, 2001

TO: Area Agency on Aging Directors

SUBJECT: Guidance for Developing Family Caregiver Support Programs

INFORMATION:

Attached is guidance for developing local OAA Family Caregiver Support Programs. Issues have been identified through several meetings with Area Agencies on Aging, input and questions from AAA staff and guidance from the Administration on Aging (AoA). AAAs will be expected to include details about their Family Caregiver Support Programs in their area plans, which can be done in combination with other amendments to your plans.

In the mean time, if you have an innovative program idea and want feedback on feasibility and fit with State and OAA expectations and requirements you may want to submit a brief program description for review and feedback. This is being offered as technical assistance to local programs and is not a requirement.

If you have any questions regarding the attachment please contact Lee Girard. There will likely be additional information on this program in the future as AoA develops regulations and additional program guidance.

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OAA Family Caregiver Support Program Guidance

Purpose: To clarify issues regarding the implementation of the OAA Family Caregiver Support Program. Questions have been raised regarding reporting of services, supplemental services, acceptable in-kind match, etc. Following is clarification and guidance for developing your Family Caregiver Support Programs.

1. Do you have an innovative program idea but are not sure if it will meet the Older Americans Act intent?

We are encouraging AAAs to submit brief project descriptions to OAA Project Coordination staff. We will check with AoA if there are questions about an interpretation of the program requirements and we will give you feedback on your proposed project. Issues to consider in your project description would be what unmet caregiver need the project addresses; how services are targeted to unpaid family caregivers; partnering with other community providers; how the project fits into the service areas outlined by OAA; and how you will meet the OAA reporting requirements

2. In the area plan amendments for the upcoming year how detailed and final do the allocations and service plans for Family Caregiver Support Program need to be?

SDSD recognizes that many AAAs will not have had the opportunity to fully explore and plan their Family Caregiver Support Programs. We would like the AAAs to fully budget their III-E allocations among the 5 service definitions outlined in SDSD-IM-01-047 (as they choose) and develop at least general service descriptions for the use of the funds. We expect that many of the AAAs will need to amend their area plans during the next year as they finalize their budgeting and service planning for the III-E funds.

3. Lifespan Respite:

- a. Can III-E funds be used to pay for office space rental, utilities, etc. for the local Lifespan Respite program?

Yes, III-E funds can be used to pay for office space rental and other such items for the Lifespan Respite program.

The funds must come from the administration budget, which is limited to 10%. Another option is to pay for the Lifespan Respite facility needs out of other local, non-federal funds and use it as match for III-E funds.

- b. What type of funding is used in the Lifespan Respite programs? This is important to know if considering using this as local match for III-E funds.

The Lifespan Respite funding that comes from the State is general fund money. Other funds that are developed at the local level to pay for respite services may come from a variety of sources, including: federal programs, private grants, fund raising, local government funding, etc.

4. Could OAA Family Caregiver Support Funds be used to provide vouchers to family caregivers to purchase desired support services in their communities?

The biggest barrier to this option is the requirement by AoA to report service data fitting into the new service categories described in SDSD-IM-01-047. If AAAs are interested in this option they should submit a proposal to SDSD describing the following: the structure of the proposed service, the unmet needs that are being met, how the use of vouchers will be monitored to ensure appropriate use of funds, any limitations on the use of the vouchers, and how the AoA reporting requirements will be met. SDSD will evaluate proposals based on how well they meet the intent of the AoA National Family Caregiver Program.

5. Can OAA Part E funds be used to support the efforts of paid family caregivers?

No. The National Family Caregiver Support Program is to “provide multifaceted systems of supports services—(1) for family caregivers; and (2) for grandparents or older individuals who are relative caregivers (Sec. 373(a)). The term ‘family caregiver’ means and adult family member, or another individual, who is an informal provider of in-home and community care to an older individual (Sec. 372).

6. Can caregivers be paid for their time to attend training?
 - a. **Yes. The guidance from AoA specifically states that this is not prohibited. Since this pertains to training AAAs should budget this service from the funds they budget for caregiver training.**
 - b. **We are suggesting AAAs provide respite services, lunch, refreshments, certificates, door prizes and other incentives to encourage attendance by family caregivers.**
7. Based on recent additional guidance from AoA on the service definitions there is a need to clarify the following services - #13a Information for Caregivers and #13b Assistance in Gaining Access to Caregiver Services.
 - a. **#13a Information for Caregivers – This may include group services, public education, provision of information at health fairs and other similar functions. Outreach is also a component of this service, with interventions for the purpose of identifying potential caregivers and encouraging their use of existing services and benefits.**
 - b. **#13b Assistance in Gaining Access to Caregiver Services – Information & Assistance: A service that provides current information on opportunities and services available; assesses the problems and capacities of the individuals; links the individuals to the opportunities and services available; to the maximum extent practicable, ensures that the individuals receive the services needed, and are aware of the opportunities available to the individuals by establishing adequate follow-up procedures.**
Case Management: Assistance either in the form of access or care coordination in circumstances where the older person or their caregivers are experiencing diminished functioning capacities, personal conditions or other characteristics which require the provision of services by formal service providers. Activities of case management include assessing needs, developing care plans, authorizing services, arranging services, coordinating the provision of services among providers, follow-up and reassessment, as required.

8. What is the difference between case management provided through #13b Assistance in Gaining Access to Caregiver Services and #70-2a Individual Counseling for Caregivers?

SDSD is interpreting Individual Counseling for Caregivers as a service that provides 1:1 support for caregivers that is not case management (as defined in #6 above). This could include mental health counseling, 1:1 support to help a caregiver cope with the stresses of caregiving, etc. When developing this service AAAs should clearly define the needs that will be met with this service and how it differs from case management.

9. SDSD will coordinate with the AAAs in identifying training and information resources that can be purchased in larger quantities by groups of AAAs (as they choose) and SDSD to reduce purchase costs.

10. Clarification of eligibility requirements for III-E respite and supplemental services.

Section 373(c)(1)(B) indicates that for respite and supplemental services family caregivers must be providing care go an older adult (60+ years old) who is unable to perform at least two activities of daily living without substantial assistance or due to a cognitive or mental impairment requires substantial supervision.

11. Support groups:

- Units of service – **Duplicated count of persons attending each support group meeting.**
- Client count – **Unduplicated count of each individual that participates in family caregiver support groups.**
- Can Part E funds be used for a support group that is multi-purpose and includes family caregivers and caregiver issues? **Yes. This meets the intent of the 2000 OAA Amendment. AAAs choosing to do this will need to show how they are recruiting and serving family caregivers in their support groups. They will also need to track and report family caregiver attendance separately from persons who are not family caregivers. With a multi-purpose support group SDSD would also**

expect to see funding or support from other resources for the service.

12. Clarification about restrictions on the use of Supplemental Services and any limitations on this service was requested.
- **Supplemental Services on a “Limited Basis” – AoA has provided guidance that expenditures for this category can be up to 20% of the overall III-E allocation.**
 - **See #9 above for care recipient functional eligibility requirements.**
 - **Examples of supplemental services –**
Home modifications
Assistive technology
Emergency response systems
Equipment
Incontinence supplies
Transportation

13. Are older adults caring for adult children or relatives with disabilities eligible for III-E services?
- No. According to the OAA Amendment a ‘grandparent or older individual who is a relative caregiver’ means a grandparent or step-grandparent of a child, or a relative of a child by blood or marriage, who is 60 years of age or older and—(A) lives with the child; (B) is the primary caregiver of the child because the biological or adoptive parents are unable or unwilling to serve as the primary caregiver of the child; and (C) has a legal relationship to the child, as such legal custody or guardianship, or is raising the child informally. The term ‘child’ means an individual who is not more than 18 years of age. AoA has indicated older adults caring for family members with disabilities between the ages of 19 and 59 are not eligible for III-E funded services. AoA is offering some limited opportunity for the aging network to apply for grants to develop innovative family caregiver services. They have included the above group of older caregivers as a “special population” that can be targeted. SDSD intends to pursue this grant opportunity.**

14. In-kind Match – see 45 CFR 92.24 for details on federal match requirements.

- **Use of “over-match” for other OAA programs – expenditures previously used to over-match other programs may be used to satisfy the non-Federal share requirement in Title III-E provided those expenditures no longer are counted toward meeting the non-Federal share requirement of the other programs and the expenditures are related to the purpose of Title III-E.**
- **Match must be applicable to the period of funding.**
- **The 25% match requirement is for the total budgeted amount, not by line item.**
- **If the party receiving the contributions would have to pay for them otherwise, the contributions are considered allowable costs to use as match.**
- **Match sources should not come from federal sources or be used to match other federal grants or programs (see “over-match discussion above for additional details).**
- **Examples of appropriate in-kind match:**
Lifespan Respite (non-federal sources)
Volunteer respite providers
Office rent, utilities, etc.
Grant funded programs (non-federal)

15. Reporting

- **The family caregiver is considered the “client” for III-E services.**
- **We are encouraging AAAs to register and track III-E clients and units of service in OR ACCESS.**
- **III-E service and client information will be reported to SDSD twice a year. Initially this reporting will be separate from NAPIS reporting. Eventually, AoA plans to include III-E in the State Performance Report.**
- **SDSD will be developing a reporting form for AAAs to use for reporting III-E client and service data.**